# **EPA Superfund Record of Decision:**

JACKSONVILLE NAVAL AIR STATION EPA ID: FL6170024412 OU 02 JACKSONVILLE, FL 09/21/1995

#### INTERIM RECORD OF DECISION

POTENTIAL SOURCE OF CONTAMINATION (PSC) 42 OPERABLE UNIT 2

NAVAL AIR STATION JACKSONVILLE JACKSONVILLE, FLORIDA

Unit Identification Code (UIC): N00207

Contract No. N62467-89-D-0317/076

Prepared by:

ABB Environmental Services, Inc. 2590 Executive Center Circle, East Tallahassee, Florida 32301

Prepared for:

Department of the Navy, Southern Division
Naval Facilities Engineering Command
2155 Eagle Drive
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Dana Gaskins, Code 1857, Engineer-in-Charge

June 1995

<IMG SRC 0495262>

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
241 COURTLAND STREET NE
ATLANTA GEORGIA 30363

4WD-FFB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Captain R. D. Whitmire Commanding Officer Naval Air Station . ~

Jacksonville, Florida 32212-5000

SUBJ: Interim Remedial Action Record of Decision Operable Unit Two - PSC 42 NAS Jacksonville, EPA I.D. FL6 170 024 412

Dear Captain Whitmire:

The United States Environmental Protection Agency (EPA) has reviewed the Department of the Navy's Interim Remedial Action Record of Decision (IROD)for Operable Unit Two - PSC 42 at Naval Air Station (NAS) Jacksonville pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), as amended. EPA concurs with the findings and the selected remedy presented in the IROD.

Sincerely,

John H. Hankinson, Jr. Regional Administrator

cc: Virginia B. Wetherell, Secretary
 Florida Department of Environmental Protection

Captain R. S. Tyler, USN, Commanding Officer Southern Division Naval Facilities Engineering Command

<IMG SRC 0495262A>

CERTIFICATION OF TECHNICAL DATA CONFORMITY (MAY 1987)

The Contractor, ABB Environmental Services, Inc., hereby certifies that, to-the best of its knowledge and belief, the technical data delivered herewith under Contract No. N62467-89-D-0317/76 are complete and accurate, and they comply with all requirements of this contract.

DATE: June 2, 1995

NAME AND TITLE OF CERTIFYING OFFICIAL: Peter Redfern

Task Order Manager

NAME AND TITLE OF CERTIFYING OFFICIAL: Mike Dunaway

Project Technical Lead

(DFAR 252.227-7036)

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# GLOSSARY

ABB-ES AOC	ABB Environmental Services, Inc. area of concern
ARARs	applicable or relevant and appropriate requirements
CAA	Clean Air Act
CAMU	corrective action management units
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CPC	contaminants of potential concern
CWA	Clean Water Act
FAC	Florida Administrative Code
FDEP	Florida Department of Environmental Protection
FDER	Florida Department of Environmental Regulation
FFA	Federal Facility Agreement
FRE	Focused Risk Evaluation
FRI	Focused Remedial Investigation
FFS	Focused Feasibility Study
FS	Feasibility Study
FOTW	federally owned treatment works

IROD Interim Record of Decision

LDR Land Disposal Restrictions
LNAPL light nonaqueous-phase liquid

mg/kg milligrams per kilogram æg/kg micrograms per kilogram

NAAQS National Ambient Air Quality Standards NEPA National Environmental Policy Act

NAS Naval Air Station

NCP National Oil and Hazardous Substances Contingency Plan

NSPS New Source Performance Standards

O&M operation and maintenance

OSHA Occupational Safety and Health Act

OU Operable Unit

PAH polynuclear aromatic hydrocarbons

PA/SI Preliminary Assessment and Site Inspection

PCBs polychlorinated biphenyls

PM10 particulate matter less than 10 microns in size

POTW Publicly Owned Treatment Works
PSC potential source of contamination

RCRA Resource Conservation and Recovery Act

RI Remedial Investigation

IROD\_PSC.42 ASW.06.95

## GLOSSARY (Continued)

SARA Superfund Amendments and Reauthorization Act

SVOCs semivolatile organic compounds

TAL target analyte list
TCL target compound list
TC toxicity characteristic
TPH total petroleum hydrocarbons
TSD treatment, storage, and disposal

TU temporary units

USC United States Code

USDOT U.S. Department of Transportation USEPA U.S. Environmental Protection Agency

USGS U.S. Geological Survey

VOCs volatile organic compounds

#### 1.0 DECLARATION FOR THE INTERIM RECORD OF DECISION

- 1.1 SITE NAME AND LOCATION. The site name is Operable Unit (OU) 2, Potential source of contamination (PSC) 42 (wastewater treatment plant effluent polishing pond) located at the Naval Air Station (NAS) Jacksonville in Jacksonville, Florida (Figures 1-1, 1-2, and 1-3).
- 1.2 STATEMENT OF BASIS AND PURPOSE. This decision document presents the selected interim remedial action for source control at PSC 42 at OU 2, NAS Jacksonville. The selected action was chosen in accordance with the requirements of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986. This decision document explains the factual basis and rationale for selecting the interim remedy at PSC 42. The information supporting this interim remedial action decision is contained in the Administrative Record for this site, which is located at the Charles D. Webb Wesconnett Branch of the Jacksonville Public Library.

The purpose of the interim remedial action for PSC 42 is to lower the risk of potential future exposure to humans and the environment by reducing the leachability of contaminated media at PSC 42 to groundwater, and to close the pond in accordance with Resource Conservation and Recovery Act (RCRA) closure requirements. Upon completion of the overall Remedial Investigation and Feasibility Study (RI/FS) for OU 2, the need for remedial action to address groundwater contamination will be evaluated. A complete RCRA closure of PSC 42 will be addressed in the overall RI/FS for OU 2.

- The U.S. Environmental Protection Agency (USEPA) and the State of Florida's Department of Environmental Protection (FDEP) concur on the selected interim remedy.
- 1.3 ASSESSMENT OF THE SITE. Actual or threatened releases of metals from the site, if not addressed by implementing the response actions selected in the Interim Record of Decision (IROD), may violate RCRA closure requirements, and leave a potential groundwater contaminant. If not addressed, this could present a future risk to human health and the environment.
- 1.4 DESCRIPTION OF THE SELECTED REMEDY. OU 2 is one of three OUs presently identified at NAS Jacksonville, Florida. This section describes the selected remedy for PSC 42, the wastewater treatment plant effluent polishing pond, at OU 2.

The preferred interim action for source control at PSG 42 is Alternative 3, developed and evaluated in the Focused Remedial Investigation and Focused Feasibility Study (FRI/FFS) for PSCs 3 and 42 at OU 2. Alternative 3 proposes stabilizing the pond sludge and the standing pond water in situ. This and other alternatives considered for PSC 42 are summarized in Table 1-1. The major components of the selected remedy include:

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<IMG SRC 0495262C>

<IMG SRC 0495262D>

## Table 1-1

## Comparative Analysis of Remedial Alternatives for PSC 42

Interim Record of Decision Operable Unit 2
Naval Air Station Jacksonville
Jacksonville, Florida

	Alternative 1: Onsite ex-situ	Alternative 2: Offsite			
stabilization Alt	ernative 3: In-situ stabilization				
	stabilization and onsite re-deposi-	and offsite disposal of the			
treat- of the	polishing pond sludge and				
	tion of the treated polishing pond	ed polishing pond sludge.			
any surface water.					
	sludge without containment.	Dewatering of the surface			
water					
Criterion	Dewatering of the surface water	in the polishing pond,			
pretreat-					
	in the polishing pond, pretreat-	sent, and discharge to the			
	ment and discharge to the Feder-	FOTW.			
	ally owned treatment works				
	(FOTW).				

Overall Protection of Human Health and the Environment

How risks are	e eliminat-	Alternative 1 would provide an	Analysis is the same as for
Alter-	Alternative	3 would provide an	
ed, reduced,	or con-	increased level of protection of	native 1. However, since
the	increased	level of protection of	
trolled		human health and the environ-	sludge is treated and
disposed	human	health and the environ-	
		sent. By stabilizing the sludge,	offsite, there will be no
contami-	sent. By	stabilizing the sludge	
		contaminant migration is mini-	nant migration.
contami-	sent. By		nant migration.

and surface water, contaminant

sized thereby reducing the risks

migration is minimized, thereby

posed by the contaminants.

reducing the risks posed by the

Following pretreatment contami-

contaminants.

nant concentrations are reduced to acceptable levels that would not pose a threat to human health and environment.

No short-term or cross-media Short-term or

Alter- Analysis is the same as for Alter-

effects ere expected for the imcross-media effects

native 1.

plementation of this alternative.

Compliance with ARARs

Chemical-, location-, This alternative will comply with

Alter-Analysis is the same as for Alter-

all ARARs concerned. It will also and action-specific

native 1.

ARARs comply with the RCRA closure

plan approved for PSC 42 at OU

Long-term Effectiveness and Permanence

Magnitude of residual The magnitude of residual risk

The magnitude of residual risk risk

risk due to the sludge at the site is

will be due to the sludge and surface

minimal. The stabilization pro-

offsite. water at the site is minimal. The

cess used to stabilize the sludge

residual stabilization process used to

will reduce the possibility of con-

stabilize the sludge and surface since

taminants leaching to the

prior water will reduce the possibility

groundwater ae well as direct

of contaminants leaching to the

exposure. There will be no resid-

groundwater as well as direct

ual risk from the surface water

exposure.

since it will undergo pretreatment prior to discharge to the

FOTW.

Adequacy of Controls Stabilization processes have

The analysis will be the same as same as

been determined to be long term

excepfor alternative 1 with the excep-

source control technologies.

treat- tion that the sludge and the

Therefore, the sludge will have ed and disposed offsite.

The analysis will be the

for alternative 1 with the

tion that the sludge will be

Analysis is the same aa for

native 1.

Analysis is the same as for

There will be no residual

from the sludge since it

treated and disposed

Also, there will be no

risk from the surface water

it will undergo pretreatment

to discharge to the FOTW.

native 1.

surface water will be stabilized

long term source control. Since

and will have long-term source

the surface water will be treated

control.

onsite prior to discharge to the FOTW and final discharge to the St. Johns River according to NPDES regulations, source control will not be an issue.

See notes at end of table.

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## Table 1-1 (Continued)

Comparative Analysis of Remedial Alternatives for PSC 42

Interim Record of Decision Operable Unit 2
Naval Air Station Jacksonville
Jacksonville, Florida

Alternative 1: Onsite ex-situ Alternative 2: Offsite

stabilization Alternative 3: In-situ stabilizatlon

stabilization and onsite re-deposi- and offsite disposal of the

treat- of the polishing pond sludge and

tion of the treated polishing pond ed polishing pond sludge.

any surface water.

sludge without containment. Dewatering of the surface

water

Criterion Dewatering of the surface water in the polishing pond,

pretreat-

in the polishing pond, pretreat- ment, and discharge to the ment and discharge to the Feder- FOTW.

disposed offsite, this

ment and discharge to the Federally owned treatment works

(FOTW).

Long-term Effectiveness and Permanence--continued

Reliability of controls Stabilization is a highly reliable Since the sludge is treated

and Analysis is the same as for Alter-

source control technology.

alternative native 1.

gives the best controls of

the three alternatives.

Reduction of Mobility, Toxicity, or Volume

 the The sludge and surface water

remedy onsite, ex-situ and disclosed remedy is the same as for

alterwill be treated in-situ, onsite

onsite without containment. The

sludge

surface water will be treated onsite, sent to the FOTW and then discharged to the St. Johns

River.

Amount of hazardous The total sludge volume of ap-Analysis is the same as for Alter-

material destroyed or proximately 9.000 cubic yards native 1 with the exception of

treated and 4 million gallons of surface

the surface water being stabilwater will be stabilized and treat-

lized as well as the sludge.

ed respectively.

Reduction of mobility, The mobility and the toxicity of

Analysis is the same as for Alter-

toxicity, or volume the sludge contaminants will be native 1. However, the

native 1. However, since the treat-

through treatment reduced due to the binding that ment and disposal of the

sludge stabilization is done in-situ the

takes place between the contam-

therefore, this reduction of mobility and toxicity

inants and the additives. How-

could be less than is alternative

ever, the volume of the sludge mobility, toxicity and the

volume 1. The volume of the stabilized

would increase after the treat-

mass including surface water

ment process due to the addi-

and sludge will be increased in

tives that will be introduced

the range of 40 to 50 percent

during the treatment process.

with the addition of stabilizing

This volume increase will be in

reagents.

the range of 20 to 50 percent. The toxicity of the surface water will also be reduced after the pretreatment and treatment at the FOTW, however, the water will be discharged to the St. Johns River. There will be no

increment in the treated volume

of surface water.

Irreversibility of treat- Stabilization processes are highly Analysis is the same as for Alter-Analysis is the same as for Alter-

native 1, however, the

will be treated and disposed

offsite.

Analysis is the same as for

native 1.

Analysis is the same as for

is done offsite and

alternative best reduces the

of the sludge.

ment irreversible on the long term. In native 1.

native 1. However, since the

other words, the bonds between

mixing is done in-situ the revere-

the contaminants and the addi-

ability could be more in this alter-

tives do not reverse on the long

native.

term. The treatment of surface water is also irreversible.

See notes at end of table.

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Table 1-1 (Continued)

Comparative Analysis of Remedial Alternatives for PSC 42

Interim Record of Decision. Operable Unit 2
Naval Air Station Jacksonville
Jacksonville, Florida

Alternative 1: Onsite ex-situ Alternative 2: Offsite

stabilization Alternative 3: In-situ stabilization

stabilization and onsite re-deposi- and offsite disposal of the

treat- of the polishing pond sludge and

tion of the treated polishing pond ed polishing pond sludge.

any surface water.

sludge without containment. Dewatering of the surface

water

Criterion Dewatering of the surface water in the polishing pond,

pretreat-

in the polishing pond, pretreat- ment, and discharge to the ment and discharge to the Feder- FOTW.

Analysis is the same as for

native 1.

ment and discharge to the Federally owned treatment works

(FOTW).

Reduction of Mobility, Toxicity, or Volume--continued

Type and quantity of The treatment residual of the

Alter- The treatment residual of the

treatment residual sludge would be a solid material

sludge and surface water would

with an increase in volume in the

be solid material with an in-

range of 20 to 50 percent of the

crease in volume in the range of

original sludge volume. The

40 to 50 percent.

treated surface water would be a liquid with no change in vol-

ume.

#### Short-Term Effectiveness

Protection of communi- If required, dust and noise con-

Alter- Berming and lining of the pond

ty during remedial ac- trol would be implemented dur-

trans- perimeter during stabilization will

tion ing dredging and dewatering

volatilization prevent pond overflow. Volatil-

operations. Volitilization of

will ization of sludge contaminants

sludge contaminants would be

would be monitored during stabi-

monitored during dredging opera-

lization operations. Work area

tions. Work area would be

would be fenced off to control

fenced off to control access.

access.

Protection of workers Workers would be required to

Alter- Analysis is the game as for Alter-

during remedial actions follow an approved Health and

native 1.

Safety Plan. Underground utilities in the vicinity will be located

and staked before intrusive

work. There are risks associated with operating stabilization and dewatering equipment which will be addressed in the Health and

Safety Plan.

Environmental effects No effects are expected to the

Alter- Analysis is the same as for Alter-

groundwater. Releases of con-

native 1.

taminants or particulate to air are

expected to have minimal envi-

ronmental effect.

Time until remedial Approximately 3 to 6 months

Approximately 2 to 4 months

action objectives are would be required to complete

complete would be required to complete

achieved the project.

the project.

See notes at end of table.

IROD\_PSC.42 ASW.06.95 Analysis is the same as for

native 1 except that during

port of sludge the

of the sludge contaminants

be controlled with foam and

covering.

Analysis is the same as for

native 1.

Analysis is the same as for

native 1.

Approximately 3 to 6 months

would be required to

the project.

#### Table 1-1 (Continued)

## Comparative Analysis of Remedial Alternatives for PSC 42

Interim Record of Decision Operable Unit 2
Naval Air Station Jacksonville
Jacksonville, Florida

Alternative 1: Onsite ex-situ Alternative 2: Offsite

stabilization Alternative 3: In-situ stabilization

stabilization and onsite re-deposi- and offsite disposal of the

treat- of the polishing pond sludge and

tion of the treated polishing pond ed polishing pond sludge.

any surface water.

sludge without containment. Dewatering of the surface

water

Criterion Dewatering of the surface water in the polishing pond,

pretreat-

in the polishing pond, pretreat- ment, and discharge to the ment and discharge to the Feder- FOTW.

ment and discharge to the Federally owned treatment works

(FOTW).

Implementability

Ability to construct Stabilization is a widely used Analysis is the same as for

Analysis is the same as for

technology technology in metal contamina- Alternative I.

Alternative 1. The handling of

tion. Stabilization vendors con-

the sludge material and surface

duct their work onsite (i.e..

water will be the least difficult

using mobile unit) or offsite

in this alternative.

(i.e., at or near a disposal facili-

ty). Dewatering companies are located locally. The handling of the sludge material will be the most difficult in this alter-

native.

Reliability of technology Stabilization is proven technol-

Alter- Oneite stabilization has been

ogy for sludge contaminated

landfills are implemented successfully at

with metals. Many proven tech- designed and constructed to

other sites with similar waste

nologies exist for pretreatment of

the water pollutant present.

contami- streams. Unlike regulated land-

. Unlike regulated land-

fills, onsite in situ stabilization

nants.

Analysis is the same as for

native 1. Regulated

minimize leaching of

does not have leaching or runoff

control protocols.

Ease of undertaking Implementation of this alternaAnalysis is the same as for

Analysis is the same as for

Care would have to be taken to

additional remedial active would pose no impediment native 1.

avoid unnecessary disturbance

tion, if necessary to additional remedialion.

of the stabilized treated wastes

when undertaking additional

investigations or remedial ac-

tions. Disturbing these areas is

undesirable because it may

provide pathways for reversal of

treatment and weakening of the

structural integrity of the stabi-

lized media.

Monitoring consider-

Air monitoring would be con-Analysis is the same as for

Alter-Analysis is the same as for Alter-

ations ducted as appropriate during native 1.

native 1.

excavation and transportation.

Coordination with NAS Jackson-Coordination with other

Alter-Analysis is the same as for Alter-

agencies ville personnel would be required native 1.

native 1.

for the duration of remedial activities. Coordination with USEPA, FDEP, county and landfill regulatory agencies would be

necessary.

See total cost and notes on following page.

IROD\_PSC.42 ASW.06.95

> Table 1-1 (Continued Comparative Analysis of Remedial Alternatives for PSC 42

Interim Record of Decision, Operable Unit 2

## Naval Air Station Jacksonville Jacksonville, Florida

Alternative 1: Onsite ex-situ stabilization

Alternative 3: In-situ stabilization

stabilization and onsite re-deposi-

treatof the polishing pond sludge and

tion of the treated polishing pond

any surface water.

sludge without containment.

water

Criterion Dewatering of the surface water

pretreat-

in the polishing pond, pretreatment and discharge to the Feder-

ally owned treatment works

(FOTW).

Implementability--continued

Availability and capaci- Stabilization will be conducted in

Stabilization will be conducted in for

ty of treatment, stor- an onsite stabilization unit. This

stabisitu for the sludge material and

age, and disposal ser- unit will have enough capacity to

surface water. A volume inbe con-

vices process 9,000 cubic yards of

crease of 40 to 50 percent is facility

sludge. The pond has enough

done expected. Berming and lining

capacity for the redeposition of

the pond perimeter will ,be t.o

the treated material. The FOTW

necessary to prevent pond

has a treatment capacity of

would overflow and provide additional

about 3 million gallons/day and it

yards treatment capacity.

currently runs at half its capaci-

percent

ty.

stabili-

Analysis is the same as for Alter-

native 1.

Ability to obtain approv- Once the Interim Record of Deci-Analysis is the same as for Alter-

als from other agencies sion (IROD) is signed the approv- native 1.

native 1.

al from the USEPA and the FDEP

Alternative 2: Offsite

and offsite disposal of the

ed polishing pond sludge.

Dewatering of the surface

in the polishing pond,

ment, and discharge to the

FOTW.

The analysis is the same as

alternative 1, however, the

lization and disposal will

ducted offsite. The

where the stabilization is

should have enough capacity

process 9,000 cubic yards of

sludge. Also, the facility

use up about 12,000 cubic

of capacity (assuming 50

increase in volume due to

zation).

Analysis is the same as for

is granted. Other local regulatory approval will be obtained before remedial action begins.

TOTAL COST contingen-

3,520,000 2,605,000 6,050,850 (without

cy for transportation)

Notes: PSC = potential source of contamination.

RI/FS = Remedial Investigation/Feasibility Study.

NAS = Naval Air Station.

ARARs = applicable or relevant end appropriate requirements.

OU = operable unit.

VOCs = volatile organic compounds.

CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act.

USEPA = U.S. Environmental Protection Agency.

FDEP = Florida Department of Environmental Protection.

RCRA = Resource Conservation end Recovery Act.

O&M = operating end maintenance.

IROD\_PSC.42 ASW.06.95

site preparation and installation of the in situ mobile stabilization unit

berming and lining the area surrounding the pond perimeter to prevent pond overflow.

in siru stabilization of polishing pond sludge and water, and

demobilization and site restoration.

Implementation of the interim action will lower the risk of potential future exposure to humans and the environment by reducing the leachability of contaminated media, and will close PSC 42 in accordance with RCRA closure requirements. The Navy estimates that the preferred alternative will cost \$2,605,000 to construct and will take 2 to 4 months to implement.

1.5 STATUTORY STATEMENT. This interim action is protective of human health and the environment, complies with Federal and State applicable or relevant and appropriate requirements (ARARs) for this limited scope of action, and is cost effective. Tables 1-2 and 1-3 summarize ARARs for the interim remedial action. Although this interim action is not intended to fully address the statutory mandate for permanence and treatment to the maximum extent practicable, this action uses treatment for contaminated materials and debris and, thus, is in furtherance of that statutory mandate. Because this action does not constitute the final remedy for contaminated groundwater at OU 2, the statutory preference for remedies that employ treatments that reduce toxicity, mobility, or volume as a principal element will be addressed by the final response action(s) for groundwater. This interim action does address the reduction of toxicity and mobility for contaminated materials (soil) considered in this remedy. Subsequent actions are planned to address the potential threats posed by the conditions in the groundwater at OU 2.

Because this is an IROD, review of this site and of this remedy will be ongoing as the Navy continues to develop final remedial alternatives for OU 2.

#### 1.6 SIGNATURE AND SUPPORT AGENCY ACCEPTANCE OF THE REMEDY

Captain R.E. Resavage Commanding Officer, NAS Jacksonville

Date

IROD\_PSC.42 ASW.06.95

site preparation and installation of the in situ mobile stabilization unit,

berming and lining the area surrounding the pond perimeter to prevent pond overflow,

in situ stabilization of polishing pond sludge and water, and

demobilization and site restoration.

Implementation of the interim action will lower the risk of protective future exposure to humans and the environment by reducing the leachability of contaminated media, and will close PSC 42 in accordance with RCRA closure requirements. The Navy estimates that the preferred alternative will cost \$2,605,000 to construct and will take 2 to months to implement.

1.5 STATUTORY STATEMENT. This interim action is protective of human health and the environment, complies with Federal and State applicable or relevant and appropriate requirements (ARARs) for this limited scope of action, and is cost effective. Tables 1-2 and 1-3 summarize ARARs for the interim remedial action. Although this interim action is not intended to fully address the statutory mandate for permanence and treatment to the maximum extent practicable, this action uses treatment for contaminated materials and debris and, thus, is in furtherance of that statutory mandate. Because this action does not constitute the final remedy for contaminated groundwater at OU 2, the statutory preference for remedies that employ treatments that reduce toxicity, mobility, or volume as a principal element will he addressed by the final response action(s) for groundwater. This interim action does address the reduction of toxicity and mobility for contaminated materials (soil) considered in this remedy. Subsequent actions are planned to address the potential threats posed by the conditions in the groundwater at OU 2.

Because this is an IROD, review of this site and of this remedy will be on ongoing as the Navy continues to develop final remedial alternatives for OU 2.

L.6 SIGNATURE AND SUPPORT AGENCY ACCEPTANCE OF THE REMEDY

Captain R.D. Resavage
Commanding Officer, NAS Jacksonville

Date

Interim Record of Decision, Operable Unit 2
Naval Air Station Jacksonville
Jacksonville, Florida

Federal Standards and

Requirements Requirements Synopsis

Consideration in the Remedial Response Process

and remediation elements of remedial response at PSC 42.

Occupational Safety and Health Establishes permissible exposure limits for workplace exposure Standards are applicable for worker exposure to OSHA hazardous Act (OSHA), Occupational to a specific listing of Chemicals. chemicals during remedial activities.

Health and Safety Regulations

[29 CFR Pad 1910, Subpart Z]

Resource Conservation and Defines those solid wastes subject to regulation as hazardous These requirements define RCRA-regulated wastes, thereby delineating Recovery Act (RCRA), Identifi— wastes under 40 CFR Parts 262-265. acceptable management approaches for listed and characteristically cation and Listing of Hazardous hazardous wastes that should be incorporated into the characterization Wastes [40 CFR Part 261]

RCRA, Releases from Solid Establishes the requirements for solid waste management units This rule is relevant and appropriate for Comprehensive Environmental Waste Management Units [40 (SWMUs) at RCRA regulated temporary storage and disposal Response, Compensation, and Liability Act (CERCLA) sites contaminated (TSD) facilities. The scope of the regulation encompasses with RCRA hazardous constituents, and potential applicable requirements

groundwater protection standards (RCRA maximum contamifor groundwater remediation executed under the RCRA Corrective Action

nant levels [MCLs]), point of compliance, compliance

period, Program. However, these requirements are not applicable to Superfund

and requirements for groundwater monitoring.

sites unless the action involves active placement in regulated units after

July 26, 1982.

Notes: ARARs = applicable or relevant and appropriate requirements.

CFR = code of Federal Regulations.

Table 1-3

Synopsis of Action-Specific Federal and State Applicable or Relevant and Appropriate Requirements (ARARs)

for Potential Source of Contamination (PSC) 42 at Operable Unit (OU) 2

## Interim Record of Decision, Operable Unit 2 Naval Air Station Jacksonville Jacksonville, Florida

Federal or State Standards and Requirements Status Consideration in the Remedial Response Process

Requirements Synopsis

Occupational Safety and Applicable Establishes permissible exposure limits for The remedial alternative at PSC 42 will require workers to be exposure to a specific listing of chemicals. Health Act (OSHA) Regulaexposed to RCRA-regulated listed hazardous waste. Therefore, tions, Occupational Health exposure limits set forth in this regulation are applicable. and Safety Regulations 129 CFR, Part 1910, Subpart Z]

RCRA Regulations, Closure Relevant and Details general requirements for closure and The substantive requirements of the rule, including groundwater and Post-Closure [40 CFR appropriate of hazardous waste facilities, including monitoring, will be met as part of the remedial alternative at this installation of Part 264] groundwater monitoring program. site. The corrective action plan will be revised to reflect the

response action selected through the CERCLA process.

RCRA Regulations, Surface Relevant and Applies to owners and operators that use Because this remedial action involves the placement of RCRA-Impoundments [40 CFR Part poundments to treat, store, or dispose of appropriate hazardous waste. regulated hazardous wastes in surface impoundments, this 264, Subpart K] regulation is relevant and appropriate. Closure requirements

should be considered for remedial actions for surface impound-

ments.

RCRA Regulations, Use and Relevant and Sets standards for the storage of containers Management of Containers appropriate waste. storage of containers containing RCRA-regulated waste onsite, [40 CFR, Part 264, Subpart I]

the substantive requirements established in this rule will be met.

RCRA Regulations, Land Relevant and Establishes procedures and operating requirements for The treatment alternative of hazardous waste should meet the Treatment [40 CFR Part 264, appropriate both closure and post-closure of land substantive construction, monitoring, operational, and closure treatment units. Subpart L] standards established within this regulation.

See notes at end of table.

#### Table 1-31 (Continued)

Synopsis of Action-Specific Federal and State Applicable or Relevant and Appropriate Requirements (ARARs)

for Potential Source of Contamination (PSC) 42 at Operable Unit (OU) 2

Interim Record of Decision, Operable Unit 2
Navel Air Station Jacksonville
Jacksonville, Florida

Federal or State Standards Status
Consideration in the Remedial Response Process
and Requirements

Requirements Synopsis

RCRA Regulations, Waste Relevant and Establishes procedures and operating requirements for Because the remedial action chosen involves the placement of piles [40 CFR Part 264, appropriate both closure and post-closure of waste piles. If removal or CERCLA generated RCRA listed hazardous waste in waste piles, decontamination of all contaminated subsoil is not possitive requirements established in this rule will be met.

ble, closure and post-closure requirements

for landfills

must be attained.

Solid Waste Disposal Act Applicable Established criteria for use in determining which solid For waste identified as non-hazardous the substantive require-Regulations, Criteria for Claswaste disposal facilities and practices pose a reasonable ments of this rule will be met. sification of Solid Waste Disprobability of adverse effect on public health or the posal Facilities and Practices environment and, therefore, constitute prohibited open 142 USC 6901-6987 and 40 dumps.

CFR Part 257)

Chapter 62.730, FAC, Florida Relevant and Adopts by reference appropriate section of 40 CFR and Both the substantive and permitting requirements of this regula-Hazardous Waste Rule, Au-appropriate establishes minor additions to these regulations concerntion will be considered in design of the remedy.

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ing the generation, storage, treatment, transportation, and

disposal of hazardous wastes.

Department of Transportation Applicable This regulation established the procedures for packaging, Requirements established in this rule will be met during trans-Rules for Transportation of labeling, and transporting of hazardous materials. portation of hazardous material from the site for laboratory Hazardous Materials [49 CFR analysis, treatment, or disposal. Parts 107, 117, 173, 148, and 179]

RCRA Regulations, LDRs for Relevant and This rule sets forth four options for management of If debris is encountered as part of the interim remedial action, Newly Listed Wastes and appropriate hazardous debris: (1) treat the debris to performance one of the four management options for hazardous debris will be Hazardous Debris [40 CFR, standards established in this rule through 1 of 17 approved implemented.

Parts 148, 260, 261,262, 264, technologies, (2) obtain a ruling from

USEPA that the

265, 270, and 271] debris no longer contains hazardous debris,

(3) treat the

debris using a technology approved through an "equiva-

treat the debris to

existing LDR standards for wastes

contaminating the

debris and continue to manage under RCRA regulations,

Subtitle C.

See notes at end of table

Table 1-3 (Continued)

for Potential Source of Contamination (PSC) 42 at Operable Unit (OU) 2

lent technology demonstration, or (4)

Interim Record of Decision, Operable Unit 2
Naval Air Station Jacksonville
Jacksonville, Florida

Federal or State Standards

and Status Requirements Synopsis

Consideration in the Remedial Response Process
Requirements

Occupational Safety and Applicable This act requires establishment of programs to assure This regulation is applicable because during remedial action at

Health Act (OSHA) Regula- worker health and safety at hazardous waste sites, in- the site, requirements of these regulations must be maintained.

tions, General Industry Stan- cludlng employee training requirements.

dards [29 CFR, Part 1910]

OSHA Regulations, Applicable Provides recordkeeping and reporting requirements Recordkeeping and reporting requirements defined in this rule

Recordkeeping, Reporting, applicable to remedial activities.

will be followed during site remediation.

and Related Regulations [29

CFR, Part 1904]

OSHA Regulations, Health Applicable Specifies the type of safety training, equipment, and All phases of the remedial response project should be executed

and Safety Standards [29 procedures to be used during site investigation and in compliance with this regulation.

CFR, Part 1926] remediation.

Chapter 62-4, FAC, Florida Applicable Establishes procedures for obtaining permits for sources of Substantive permitting requirements of this rule will be met Rules on Permits, May 1991 pollution.

during the remedial action at PSC 42.

Chapter 62-736, FAC, Applicable Requires warning signs at National Priority List (NPL) and Because Naval Air Station Jacksonville is currently listed on the Florida Rules on Hazardous FDEP (formerly FDER) identified hazardous waste sites to NPL, this requirement is applicable.

Waste Warning Signs, August inform the public of the presence of potentially harmful

1994 conditions.

Notes: NAS = naval air station.

CFR = Code of Federal Regulations.

CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act.

CWA = Clean Water Act.

POTW = publicly owned treatment works.

FOTW = federally owned treatment works.

USC = U.S. Code.

FAC = Florida Administrative code.

USEPA = U.S. Environmental Protection Agency.

FDEP = Florida Department of Environmental Protection.

FDER = Florida Department of Environmental Regulation.

### 2.0 DECISION SUMMARY

2.1 SITE NAME, LOCATION, AND DESCRIPTION. NAS Jacksonville is located in Duval County, Florida, on the western bank of the St Johns River: OU 2 is located in the northern Part of the installation (Figure 1-3). The official mission of NAS Jacksonville is to provide facilities service, and managerial support for the operation and maintenance of naval weapons and aircraft to operating forces of the U S. Navy as designated by the Chief of Naval Operations. Some of the tasks required to accomplish this mission include operation of fuel storage facilities, performance of aircraft maintenance, maintenance and operation of engine repair facilities and test cells for turbojet engines, and support of special weapons systems.

The land use west of OU 2 is primarily residential and recreational. The Timuquana Country Club and Golf Course border OU 2 to the west. Access to the country club is restricted to members and guests. Two private residences abut the NAS boundary on the northwest side of OU 2 near the St. Johns River. A residential area (trailer park) also abuts the NAS boundary west of the Timuquana Country Club; the distance from this trailer park to OU 2 is about 3,000 feet. Access to OU 2 is limited because of its proximity to the NAS taxiways and runways, which have additional security requirements. A chainlink fence along the base boundary and continuous patrols make access, by unauthorized personnel unlikely and limited.

2.2 SITE HISTORY AND ENFORCEMENT ACTIVITIES. The area incorporated into NAS

Jacksonville has been used for U.S. Navy operations since 1940. OU 2, which is located on the northern part of NAS Jacksonville, has historically been used primarily for wastewater treatment. Its secondary use has been for fire-fighting training.

Past operations at the wastewater treatment plant located within OU 2 that possibly affected soil quality include:

drying sludge in unlined beds (PSCs 41 and 43),

discharge of treated water to an unlined polishing pond (PSC 42), and

land disposal of sludge removed from the drying beds (PSCs 3 and 4).

In addition to the treatment plant, a former fire-fighting training area (PSC 2) is located within OU 2. Burning fuels within the unlined pit at the training area has affected soil quality at PSC 2.

Probable waste materials disposed of at OU 2 include aviation fuel and waste petroleum products (at the former fire-fighting training area), inorganic and organic compounds (at the domestic and industrial wastewater sludge drying beds), and asbestos (at PSC 4). PSC 4 will be evaluated during the site-wide Remedial Investigation and Feasibility Study (RI/FS) to be conducted in 1995. An FRI/FFS study has been completed for PSCs 2, 41, and 43, and the IROD was signed on September 29, 1994. Interim remedial action for PSCs 2, 41, and 43 is scheduled to occur in 1995. An FRI/FFS has also been completed at PSCs 3 and 42. As a result of this FRI/FFS, it was determined that there was no need for an interim remedial action at PSC 3. Therefore, PSC 3 will be included in the site-wide RI/FS with PSC 4. Investigations and site history of PSC 42 are described briefly in the following paragraphs.

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PSC 42 is the wastewater treatment plant effluent polishing pond. It has a capacity of approximately 5.7 million gallons and was built in 1970 to provide final clarification and settling for approximately 2.3 million gallons per day of treated wastewater effluent. It currently contains water from precipitation and seepage from groundwater. The pond was removed from service in 1987. It appears that the surface water level in the polishing pond is controlled by both rainfall events and fluctuations in the groundwater elevation.

The USEPA classified the polishing pond as a surface water impoundment to treat RCRA-listed hazardous wastes F006 and F019 (i.e., wastewater treatment sludge from electroplating operations and from the chemical conversion coating of aluminum) (Process Code T02). The hazardous constituents for which the sludge is listed consist of cadmium, hexavalent chromium, nickel, and cyanide (complexed) for F006 and hexavalent chromium and cyanide (complexed) for F019.

In 1988, after a review of groundwater monitoring data, the FDEP issued a Consent Order requiring closure of the effluent polishing pond. In response to the Consent Order, NAS Jacksonville developed a closure plan for the wastewater treatment plant polishing pond (PSC 42). This closure plan also included PSCs 41 and 43 at OU 2, and in September 1991, FDEP issued a permit for closure and post-closure at PSCs 41, 42, and

As provided in Section VII of the Federal Facility Agreement (FFA), parties should intend to integrate the Navy's CERCLA response obligations and RCRA corrective action obligations into any remedial actions. As such, the FFA establishes the mechanism whereby remediation of the PSC will occur under the provisions of CERCLA with RCRA considered as an ARAR with respect to releases of hazardous waste. Further, the FFA states that permits shall be modified again after the CERCLA process has resulted in the final selection of a remedial action.

PSC 42 has been investigated for groundwater compliance with RCRA standards since 1983. Monitoring wells in the vicinity of the pond were sampled and analyzed quarterly for 1 year beginning in 1984 in accordance with an FDEP and RCRA closure and post-closure permit. Inorganic constituents exceeded permit standards at the point of compliance monitoring wells in the shallow aquifer zone.

During July 1994, PSC 42 was included in a sampling event to assess the potential or actual contamination of surface water, sediment, and biota at three surface water bodies located within NAS Jacksonville, and to report any constituent concentrations that were greater than standards or guidelines established by the Federal ambient water quality criteria or Florida surface water classification standards. Details concerning this event can be found in the Sampling Event Report Number 17, Electrofishing Fisheries Investigation at Selected Water Bodies, Naval Air Station, Jacksonville, Florida (ABB-Environmental Services, Inc. [ABB-ES] 1993b). Sediment samples were analyzed for volatile organic compounds (VOCs), semivolatile organic compounds (SVOCs), pesticides, polychlorinated biphenyls (PCBs), and inorganics. According to the Sampling Event Report Number 17, PSC 42 contained levels of inorganic compounds above background levels in surface water and sediment samples.

 $2.3\,$  HIGHLIGHTS OF COMMUNITY PARTICIPATION. The FRI/FFS report for PSC 42 at OU 2 and the Proposed Plan were completed and released to the public on May 10, 1995. These documents and other Installation Restoration program information are available for public review in the Information Repository and Administrative Record. The repository

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is maintained at-the Charles D. Webb Wesconnett Branch of the Jacksonville Public Library in Jacksonville, Florida. The notice of availability of these documents was published in The Florida Times Union on May 10, 1995.

- A 30-day public comment period was held from May 10, 1995, to June 9, 1995. Written comments were received during the public comment period. Written comments and questions asked by the public are summarized and addressed in Appendix A, Responsiveness Summary.
- 2.4 SCOPE AND ROLE OF INTERIM REMEDIAL ACTION. A focused risk evaluation (FRE) was conducted on the soil surrounding the polishing pond, PSC 42. The FRE did not address the sludge and water present in the polishing pond; however, these materials are being treated as part of this remedial action. A risk assessment on the soil surrounding the pond indicated unacceptable risks were not predicted from exposure to surface soil at PSC 42 for either humans, terrestrial wildlife, plants, or soil invertebrates.

RCRA closure requirements support removal of the source. Therefore, source removal was determined to be the interim remedial action objective for PSC 42. The interim remedial action objective for PSC 42 is to reduce future potential risks to human health and the environment and comply with the RCRA closure plan approved for this PSC, as discussed in the FRI/FFS report. Metal contaminants are potentially acting as a continuing source of soil and groundwater contamination at OU 2. The purpose of this interim remedial action is to remove this source of contamination to the soil and groundwater at OU 2. Based on previous investigations and the evaluation of ARARs for this site, the interim remedial action identified is in situ stabilization of the polishing pond sludge and standing water.

Upon completion of the overall RI/FS for OU 2, the need for remedial action to address groundwater contamination will be evaluated. This IROD addresses an interim source control for contaminated materials at PSC 42 and is consistent with any future remedial activities that may take place at the site.

2.5 SITE CHARACTERISTICS. Sampling and analysis of soil, surface water, and sediment found within the effluent polishing pond (PSC 42) were completed as part of the focused RI/FS investigation conducted in September 1994. Soil and sediment samples were analyzed for VOCs, SVOCs, pesticides, PCBs, and inorganics. Surface water samples from the polishing pond were analyzed for target analyte list (TAL) inorganics and miscellaneous wet chemistry parameters. In addition to analyzing the surface water and sediment within the polishing pond, surface soil samples around the perimeter of the pond were analyzed to investigate the possible migration of contaminants from the potential of past flooding and maintenance activities. All surface soil and sediment samples were first screened for the following metals: arsenic, cadmium, chromium, lead, and nickel. The list of selected metals for screening is based on previous soil and groundwater analytical results (ABB-ES, 1992b). Based on the findings of the screening, the soil and sediment were analyzed for TAL inorganics. As part of the base-wide groundwater modeling effort conducted in collaboration with the U.S. Geological Survey (USGS), four piezometer wells were installed on the south and west sides (potentially upgradient) of PSC 42. In addition to groundwater elevation data, groundwater samples were collected and analyzed for contaminants of potential concern (CPC), target compound list (TCL), and TAL parameters and selected water quality tests from the four piezometer wells and two existing downgradient wells. Groundwater data

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collection was intended to provide data to support an evaluation of remedial alternatives at PSC 42. The results of the FRI/FFS investigation, which was designed to characterize the extent of metal contamination at PSC 42, are summarized in this section.

Surrounding soil, surface water, and sediment samples at PSC 42 contained inorganics related to the operation of the polishing pond. Fifty-six soil samples were collected from the soil surrounding the pond for screening of the five metals. From the screening data, chromium, lead, and cadmium were the most often detected metals in the soil around PSC 42. Chromium and lead were detected in all 56 samples collected (including 6 field duplicates). All of the detections of chromium were above background concentrations, whereas only 40 percent of the lead samples were above

background concentrations. Cadmium was detected in 46 of 56 samples and nickel was detected in 7 of 56 samples. All detections of cadmium and nickel were above background concentrations. Arsenic was below detection limits in all 56 screening samples collected. Twelve samples were collected for TAL inorganic analytical results to confirm the detection of the above selected screening metals. Lead was detected in all 12 samples (including 2 field duplicates), chromium was detected in 11 of 12 samples, and cadmium was detected in 7 of 12 samples. Iron and aluminum were present in all 12 samples. Antimony, arsenic, barium, beryllium, copper, magnesium, nickel, potassium, sodium, thallium, and vanadium were not detected. Soil samples from areas surrounding the effluent polishing pond were also found to contain a pesticide, which does not appear to be related to PSC 42 operations and may have been a result of past base-wide pest control programs.

Seventeen sediment samples (including two field duplicates) were collected for screening of the five metals. From the screening data, chromium, cadmium, lead, and nickel were detected in all 17 samples (including 2 field duplicates). There was no detection of arsenic in the sediment samples. Four sediment samples were collected for TAL inorganic analyses to confirm the detection of the above selected screening metals. Fifteen TAL inorganic parameters were detected in all four sediment samples. Antimony, arsenic, and selenium were detected in one of the four samples, and sodium and nickel were detected in two of four samples. There are no detections of cobalt, potassium, or thallium. Two of seventeen sediment samples were submitted for total and hexavalent chromium analysis. Hexavalent chromium was not detected in the sample, indicating that the chromium in the sediment is most likely in the trivalent oxidation state.

Three surface samples in the pond were collected and analyzed for TAL inorganics. Metals detected in all three surface water samples include aluminum, barium, calcium, chromium, iron, lead, magnesium, manganese, nickel, potassium, and sodium. Zinc was not detected in two of three samples. There were no detections of antimony, arsenic, cadmium, copper, mercury, selenium, silver, vanadium, and cyanide.

Investigation of groundwater at PSC 42 in the FRI/FFS was conducted solely for the purpose of gathering data to support an evaluation of remedial alternatives for the sediment and surface water. A full evaluation of the groundwater analytical data was deferred until the execution of the overall OU2 RI/FS report.

2.6 SUMMARY OF SITE RISKS. An FRE was completed as a means of characterizing potential risks to humans and the environment that could be attributed to exposure to contaminants present in the soil surrounding the polishing pond, PSC 42. The FRE did not address the sludge and water present in PSC 42 (polishing pond); however, these

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materials are being treated as part of this remedial action. A risk assessment on the soil surrounding the pond indicated unacceptable risks were not predicted from exposure to surface soil at PSC 42 for either humans, terrestrial wildlife, plants, or soil invertebrates. However, RCRA closure requirements support removal of the source, the sediment and surrounding surface soil, to comply with ARARs for PSC 42.

2.7 SELECTED REMEDY. Of the three alternatives evaluated, the selected interim

remedial action for source control at the PSC 42 at OU 2 is Alternative 3, described in the FRI/FFS report for OU 2. Alternative 3 involves:

site preparation and installation of the in situ mobile stabilization unit,

berming and lining the area surrounding the pond perimeter to prevent pond overflow,

in situ stabilization of polishing pond sludge and water, and

demobilization and site restoration.

The concentrations of contaminants in the materials at PSC 42 are above the RCRA Land Disposal Restrictions (LDR) treatment standards for those hazardous wastes and, thus, would require treatment prior to disposal. As previously discussed, the materials are contaminated with metals. The treatment technology proposed in this alternative is in situ stabilization, which involves immobilizing the metals in the contaminated material by adding a setting agent such as Portland cement. Metals are not destroyed by this treatment process, but rather become physically and chemically entrapped in the resulting material, which can take the form of a semisolid to a solid. Long-term monitoring of this treated soil is contemplated under RCRA and will be incorporated in the final remedy for OU 2.

The sides of the polishing pond will be bermed to the necessary elevation to provide room for the added stabilization mixture; i.e., concrete, sand, and any reagents. After the in situ stabilization process, the product and contaminated pond water will remain in place.

Once treatment is completed, the site will be graded and seeded for revegetation All equipment and features associated with the interim remediation would be removed at the end of the process.

The Navy estimates the total cost of this interim remedial action to be \$2,605,000 to construct and maintain.

2.8 STATUTORY DETERMINATIONS. The interim remedial action selected for implementation at PSC 42 is consistent with CERCLA and the National Oil and Hazardous Substances Contingency Plan (NCP). The selected remedies are protective of human health and the environment, attain ARARs, and are cost effective. The selected remedies also satisfy the statutory preference for remedial treatment of metals that significantly reduces the mobility, toxicity, or volume of hazardous substances as a principal element. Because this remedy is not intended as the final action for remediation of the contaminated soil and groundwater at OU 2, the statutory preference for treatment of this media will be addressed during the final FS for OU 2. Long-term monitoring of

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this treated soil is contemplated under RCRA and will also be incorporated into the final remedy for OU 2.

Additionally, the selected remedy uses alternate treatment technologies or resource

recovery technologies to the maximum extent practicable. Because this remedy is not intended as the final remedial effort for groundwater at OU 2, any contaminated media remaining onsite after this interim remedial action will be addressed during the overall RI/FS for OU 2 and the resulting Record of Decision.

2.9 DOCUMENTATION OF SIGNIFICANT CHANGES. There are no significant changes in this interim remedial action from that described in the Proposed Plan.

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#### APPENDIX A

#### RESPONSIVENESS SUMMARY

#### Appendix A, Responsiveness Summary

The Responsiveness Summary serves three purposes. First, it provides regulatory agencies with information about the community preferences regarding the remedial alternatives presented for Potential Source of Contamination (PSC) 42, at Operable Unit (OU) 2, Naval Air Station (NAS) Jacksonville. Second, the Responsiveness Summary documents how public comments have been considered and integrated into the decision-making process. Third, it provides the Navy, U.S. Environmental Protection Agency (USEPA), and Florida Department of Environmental Protection (FDEP) with the opportunity to respond to each comment submitted.

The Focused Remedial Investigation and Focused Feasibility Study for PSCs 3 and 42 and the Proposed Plan for PSC 42 were made available in an information repository maintained at the Charles D. Webb Wesconnett Branch of the Jacksonville Public Library.

The following comments were received during the public comment period.

Responsiveness Summary

Interim Record of Decision

Potential Source of Contamination 42 at Operable Unit 2

Naval Air Station Jacksonville

Jacksonville, Florida

Comment Response

NO COMMENTS RECEIVED